

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

HOUSING COURT DEPARTMENT
EASTERN DIVISION
CASE NO. 19-CV-000374

CITY OF BOSTON INSPECTION.)
SERVICES DEPARTMENT,)
Plaintiffs,)
)
v.)
)
CATHERINE LEE, as)
Trustee of the FUN SEN LEE TRUST)
Esther Zee Lee, as Trustee LEE FAMILY)
TRUST)
Defendant.)



Certified to be a true and
correct copy of the original
Robert M. Farrell, Clerk
U. S. District Court
District of Massachusetts
By: *Halley C. Smith*
Deputy Clerk

Date: 10/6/2020

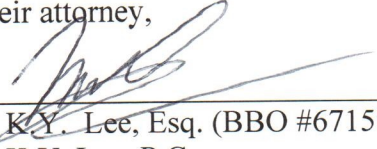
NOTICE OF REMOVAL

PLEASE TAKE NOTICE THAT on October 1, 2020, Defendant(s), Catherine Lee, as Trustee of the Fun Sen Lee Trust and Esther Zee Lee, as Trustee of the Lee Family Trust, in the above-captioned action removed this action to the United States District Court for the District of Massachusetts, by filing a Notice of Removal in that Court. A copy of the Notice of Removal is attached as Exhibit 1. This case was filed on or about June, 2019, sixteen years after the Defendant Fun Sen Lee Trust was terminated. A Receiver was formally appointed on or about September 11, 2020, without ever noticing to the legal owner Beneficiaries of the realty as required by the Due Process Clause of the 14th Amendment of the US Constitution. A conveyance was made to the Lee Family Trust and recorded on or about August, 2020. Defendant Esther Zee Lee, As Trustee of Lee Family Trust was joined in as a Defendant, **on September 29, 2020**, without notice compliance with Due Process Clause of the 14th Amendment.

This case is timely removed to federal court under 28 U.S.C. § 1446(b)(1), (b)(3) and (c)(1) and this Court retains **federal question jurisdiction** 28 U.S.C. § 1331 as it involves the violation of the Due Process Clause under the 14th Amendment of the US Constitution. Defendants will suffer damages in excess of \$75,000.00 as a Receiver has been wrongfully imposed by the Plaintiff to oversee a building renovation valuing at over \$4 million without Due Process and in violation of the Constitution. In removing this case to federal court, the Defendants do not admit any of the allegations made in the Plaintiff's Complaint or Waive any available defenses.

Accordingly, and pursuant to 28 U.S.C. § 1446(d), **this Court may proceed no further unless and until the case is remanded.**

Respectfully submitted
On behalf of the Plaintiffs,
By their attorney,



Mary K.Y. Lee, Esq. (BBO #671592)
Mary K.Y. Lee, P.C.
52 Temple Place, Fourth Floor
Boston, MA 02111
(617)426-1689
marykylee@marylee-law.com

Dated: October 1, 2020

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October, 2020 a true and accurate copy of the above-captioned Notice was served by email, upon counsel of record for the Plaintiff, Edward Coburn, Esq. and Neil R. Janulewicz, Jr. Esq., Stuart Shrier, Esq.



Mary K. Y. Lee